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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
DATE FILED: 3/24/09

ROBERT R. GLENN, on behalf of himself and
all others similarly situated,

Plaintiff,

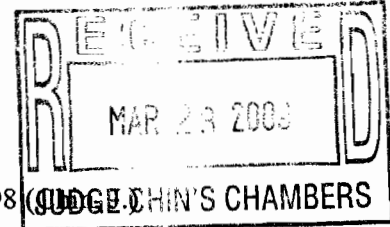
v.

CHASE BANK USA, N.A.,

Defendant.

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Case No. 09-CV-1898

**JOINT MOTION TO
STAY PROCEEDINGS**

Plaintiff Robert R. Glenn ("Plaintiff") and Defendant Chase Bank USA, N.A ("Chase") (collectively, the "Parties"), by and through their respective counsel, hereby jointly move for and stipulate to a stay of all proceedings in this case pending the ruling on the Motion for Transfer and Coordination Pursuant to 28 U.S.C. § 1407 (the "Motion") currently pending before the Judicial Panel on Multidistrict Litigation (the "Panel").

Such a stay of proceedings in this case (and in other similar cases) pending the decision of the Panel is appropriate and within the discretion of the Court. *See, e.g., Bonenfant v. R.J. Reynolds Tobacco Co.*, 2007 WL 2409980 (S.D. Fla. July 31, 2007) ("It is a common practice for courts to stay an action pending a transfer opinion by the [Panel]."); *Republic of Venezuela v. Philip Morris Cos., Inc.*, 1999 WL 33911677 (S.D. Fla. Apr. 28, 1999) (holding district court has "inherent power" to stay proceedings pending decision by Panel on transfer motion). Such a stay is in the interests of justice and judicial economy because, if the Panel rules in favor of transfer and coordination, then the cases should proceed in a coordinated fashion as determined by the transferee court.

Accordingly, the parties hereby stipulate to a stay of all proceedings in this case before this Court until such time as the Panel rules on the Motion. Plaintiffs reserve the right to move

upon good cause to lift the stay, in which case Defendant shall have ten (10) days from an order lifting the stay in which to file an answer or otherwise respond to the Complaint.

Respectfully submitted,

/s/ Gary B. Friedman

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Attorneys for Defendants

IT IS SO ORDERED.

DATED: 3/24/09


UNITED STATES DISTRICT COURT